

1 Lee Edmond
2 EDMOND LAW, PLLC
3 2615 11th Avenue W
4 Seattle, WA 98119
5 (206) 428-7734

6 Attorney for Veronica Elvira Cortez

7 IN THE UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,]

10 Plaintiff,]

11 vs.]

12 VERONICA ELVIRA CORTEZ,]

13 Defendant.]

15-CR-6049-EFS-24

DEFENDANT'S MOTION FOR
WAIVER OF RIGHT TO
ATTEND PRETRIAL HEARING
AND DECLARATION OF
COUNSEL IN SUPPORT
THEREOF

16
17 MOTION
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19 Defendant Veronica Elvira Cortez, through her attorney of
20 record, Lee Edmond, moves this Court for permission to waive her presence
21 at the Pretrial Conference presently scheduled for February 21, 2017 at
22 1:30, p.m., in Richland, Washington. Ms. Cortez resides in Sedro-Woolley,
23 Washington, approximately 268 miles from the federal courthouse and has
24 limited means of transportation.
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27 Wherefore, defendant moves this Court for permission to waive her
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3 presence at the pretrial conference.
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6 s/Lee Edmond
7 Lee Edmond, WSBA # 34693
8 Attorney for Defendant

9 **DECLARATION OF COUNSEL**

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11 I, Lee Edmond, declare:

12 1. I am the court-appointed attorney for Veronica Elvira Cortez.

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14 2. I have discussed with Ms. Cortez her right to be present at the
15 Pretrial Conference scheduled for February 21, 2017 at 1:30 p.m. s

16
17 3. Ms. Cortez knowingly, voluntarily and intelligently waives her
18 right to be present at the hearing after consultation with me.

19
20 4. Ms. Cortez understands that I will represent her interests at the
21 scheduled hearing. Having thoroughly discussed whether to attend the
22 hearing in-person or to waive her right to be present, Ms. Cortez has
23 knowingly and voluntarily chosen to waive her presence at this hearing.
24

25 5. I have consulted with Assistant United States Attorney Stephanie
26 Van Marter and she has no objection to Ms. Cortez' waiver of her presence
27 at the hearing.
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1 I declare under penalty of perjury under the laws of the State of
2 Washington that the foregoing is true and correct.
3

4 s/Lee Edmond

5 Lee Edmond, WSBA # 34693
6 Attorney for Defendant
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CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2017, I electronically filed the Defendant's Notice of Joinder with the Clerk of the Court using the CM/ECF System which will send notification of such filing to Stephanie Van Marter, Assistant United States Attorney, and to the attorneys of record in the above-entitled case.

DATED this 7th day of February, 2017.

s/ Lee Edmond

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